

TIMOTHY W. BOWMAN, ESQ.  
FARLEY & GRAVES, P. C.  
807 G Street, Suite 250  
Anchorage, Alaska 99501  
Phone: (907) 274-5100 Fax: (907) 274-5111  
Email: tbowman@farleygraves.com

Attorneys for Defendant Barbara Knox, M.D.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT FAIRBANKS**

JUSTIN ACKER, EMILY ACKER, E.A. (2019),  
I.A. (2020; JOHN DOE, JANE DOE, JOHN DOE  
JR. (2020), AND JANE DOE JR. (2016),

Plaintiffs,

v.

PROVIDENCE HEALTH & SERVICES  
WASHINGTON d/b/a PROVIDENCE ALASKA  
MEDICAL CENTER, BARBARA KNOX, M.D.,  
and BRYANT SKINNER,

Defendants.

Case No. 4:22-cv-00017 SLG

**DEFENDANT BARBARA KNOX M.D.'S RESPONSES TO  
PLAINTIFFS' SECOND DISCOVERY REQUESTS**

Defendant, Barbara Knox, M.D., through counsel, Farley & Graves, P.C., hereby responds to Plaintiffs' Second Discovery Requests to Defendant Knox, dated August 3, 2023 as follows:

**INTERROGATORIES**

**INT. 10:** IN PAMC 163 you discussed Medicaid fraud and billing issues. Please state the details of the Medicaid fraud and billing issues you describe.

**ANSWER:** Medicaid requires that a provider complete its records within 14 days of billing for a date of service. When I joined Alaska CARES, the medical team I supervised was not always completing the medical records within the required time after billing. I worked with PAMC leadership to rectify the issue and made sure that records were produced in a timely manner.

**INT. 11:** Please state any compensation or honorarium type benefit ever received by you from the State of Alaska. For each such, please describe the date, amount, and what it was paid or provided for. For example, if OCS had you give a training in Fairbanks and they bought you an airline ticket and bought you lunch but paid you no other money, you should tell us what date or dates, what the training was for, and the approximate value of whatever the State of Alaska provided to you.

**ANSWER:** Dr. Knox objects to Plaintiff's Interrogatory No. 11 as overly vague. Notwithstanding and without waiving said objection, Dr. Knox does not recall receiving any compensation or honorarium type benefit from the State of Alaska. Dr. Knox did provide live grand jury testimony in Kotzabue, but she does not recall when that occurred. As required by Alaska Rule of Administration 7, the State paid her travel and lodging but Dr. Knox believes she purchased her own meals. Dr. Knox does not recall if the State paid a testimony fee as required by Administrative Rule 7.

#### **REQUESTS FOR ADMISSIONS**

**RFA 8:** Please admit that you have received at least one 1099 from the State of Alaska.

**ANSWER:** Admit. Dr. Knox received Form 1099s from the SOA for her PFDs in 2021 and 2022.

**RFA 9:** Please admit the State of Alaska has provided you compensation.

**ANSWER:** Dr. Knox objects to Plaintiff's Request for Admission No. 9 as overly vague. Notwithstanding and without waiving said objection, Dr. Knox received PFDs in 2021 and 2022. Additionally, when she testified before the grand jury in Kotzabue, the State paid for her air fare, lodging, but she does not recall if she received the statutory witness fee.

**RFA 10:** Please admit the State of Alaska has reimbursed you for expenses.

**ANSWER:** Dr. Knox objects to Plaintiff's Request for Admission No. 10 as overly vague. Notwithstanding and without waiving said objection, Dr. Knox does not recall any instance where the State of Alaska reimbursed her for expenses, except to the extent that she may have purchased her own tickets to Kotzebue for grand jury testimony and prepaid for her lodging.

**RFA 11:** Please admit the State of Alaska has provided you benefits such as airplane tickets, lodging, or meals.

**ANSWER:** Dr. Knox objects to Plaintiff's Request for Admission No. 11 as overly vague. Though, Dr. Knox would not consider airplane tickets, lodging and meals related to travel for grand jury testimony to be "benefits," as noted in her responses above, the State covered at least her tickets and lodging when she traveled to Kotzebue for that purpose.

#### **REQUEST FOR PRODUCTION**

**RFP 8:** Please provide any 1099 received from the State of Alaska.

**ANSWER:** Please see attached the Form 1099s issued to Dr. Knox for her 2021 and 2022 PFD payments Bates No. KNOX. 004027-004030.

DATED this 5<sup>th</sup> of September 2023 at Anchorage, Alaska.

FARLEY & GRAVES, P. C.

By: s/Timothy W. Bowman  
TIMOTHY W. BOWMAN  
Alaska Bar No.: 0905012  
Attorneys for Defendant Barbara Knox,  
M.D.

**CERTIFICATE OF SERVICE**

Pursuant to Civil Rule 5, I hereby certify that on the 5<sup>th</sup> day of September 2023, a true and correct copy of the foregoing was served EMAIL TRANSMISSION on the following person(s):

Michael C. Kramer, Esq.  
Kramer and Associates  
542 4th Ave., Suite 207  
Fairbanks, AK 99701  
*Counsel for Plaintiffs*  
[service@mikekramerlaw.com](mailto:service@mikekramerlaw.com)  
[arnell@mikekramerlaw.com](mailto:arnell@mikekramerlaw.com)

Chester D. Gilmore Esq.  
Cashion Gilmore, LLC  
510 L Street, Suite 601  
Anchorage, AK 99501  
*Counsel for Providence and Bryant Skinner*  
[chester@cashiongilmore.com](mailto:chester@cashiongilmore.com)  
[jennifer@cashiongilmore.com](mailto:jennifer@cashiongilmore.com)

By: s/Joyce L. Wylie  
Joyce L. Wylie, Legal Assistant  
[jwylie@farleygraves.com](mailto:jwylie@farleygraves.com)

**VERIFICATION**

STATE OF FLORIDA )  
 ) ss.  
COUNTY OF \_\_\_\_\_ )

I, BARBARA KNOX, M.D., being first duly sworn, depose and state as follows: I am the Defendant. I have read the foregoing Interrogatories and understand the contents thereof; I have executed this document as my free and voluntary act and deed for the purposes therein set forth; and I verify that the same is true to the best of my knowledge and belief.

Signature: Barbara Knox MD

Printed name: Barbara Knox MD

Title: Medical Doctor

SUBSCRIBED AND SWORN to before me this 14 day of September 2023, at Jacksonville, Florida.

*[Signature]*

Notary Public in and for the State of Florida  
My Commission Expires: October 20, 2025

